



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

January 21, 2022

**VIA ECF**

Honorable Gregory H. Woods  
United States District Judge  
United States District Court  
500 Pearl Street, Room 2260  
New York, NY 10007

Re: *Charpentier, et al. v. Department of Homeland Security, et al.*, 20 Civ. 7510 (GHW)

Dear Judge Woods:

The parties hereby submit this Joint Status Report pursuant to their representation to the Court that they would file their next status report on January 21, 2022, and pursuant to this Court's Order. *See* ECF Nos. 56, 57. The parties are continuing to confer regarding the FOIA requests made to United States Immigration and Customs Enforcement ("ICE"), United States Department of State ("State") and United States Citizenship and Immigration Services ("USCIS"), however, the parties need additional time to continue conferring. As explained in the previous letter, *see* ECF No. 57, the government had requested additional information from plaintiffs' counsel regarding the ICE and State FOIA requests, and Plaintiffs' counsel has stated that she intends to provide that information to the government by January 25, 2022. USCIS has provided a draft *Vaughn* index, and the parties need to confer further in hopes that they can resolve issues relating to the USCIS production without further intervention of the Court. The parties therefore respectfully request that they file a joint status letter on March 8, 2022.

On behalf of both parties, I thank the Court for its consideration of this submission.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

s/ Rebecca R. Friedman  
REBECCA R. FRIEDMAN  
Assistant United States Attorney  
86 Chambers Street, 3rd floor  
New York, NY 10007  
Tel: (212) 637-2614  
rebecca.friedman@usdoj.gov